

BEFORE THE FEDERAL ELECTION COMMISSION

2003 APR 15 A 11: 57

In the Matter of)

MUR 5101

Rabbi Yaakov Bender, *et al.*)

SENSITIVE

GENERAL COUNSEL'S REPORT #3

I. ACTIONS RECOMMENDED

1. Accept the attached conciliation agreement with Rabbi Yaakov Bender.
2. Take no further action and send an admonishment letter to Yeshiva Darchei Torah.
3. Close the file.

II. INTRODUCTION

This matter involves the reimbursement of fourteen contributors to Roger Kahn's 2000 campaign committee. Rabbi Bender, the dean of Yeshiva Darchei Torah ("Yeshiva"), an incorporated nonprofit private academy, admitted that he used money from the Rabbi's Fund, a special Yeshiva account over which he has sole control, to reimburse himself and thirteen of his employees for their \$1,000 campaign contributions.

III. DISCUSSION

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Based on those reasons, and Rabbi Bender's full
cooperation in the matter including taking complete responsibility, we recommend that the
Commission take no further action as to the Yeshiva and send an admonishment letter instead.

IV. RECOMMENDATIONS

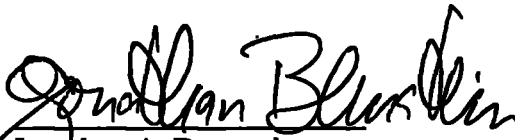
1. Accept the attached conciliation agreement with Rabbi Yaakov Bender.
2. Take no further action as to Yeshiva Darchei Torah and send an admonishment letter.
3. Close the file.
4. Approve the appropriate letters.

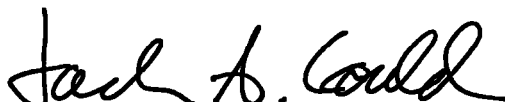
Lawrence H. Norton
General Counsel

4/14/23
Date

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